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Interim Co-Lead Counsel for Plaintiffs and the Proposed Class

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

17 IN RE: HIGH-TECH EMPLOYEE
ANTITRUST LITIGATION

Master Docket No. 11-CV-2509-LHK

**STIPULATION AND [PROPOSED]
ORDER AMENDING CASE SCHEDULE**

19 THIS DOCUMENT RELATES TO:
20 ALL ACTIONS

AS MODIFIED

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2 ALL PARTIES HEREBY STIPULATE AND AGREE:

3 Pursuant to the Court's July 2, 2012 Order re Case Schedule (Dkt. No. 165), counsel for
4 all parties have conferred and propose the following extensions of the case schedule:

EVENT	CURRENT	PROPOSED
Motion for Class Certification	July 19, 2012	September 17, 2012
Opposition to Motion for Class Certification	August 30, 2012	October 29, 2012
Reply In Support of Class Certification	September 20, 2012	November 26, 2012
Hearing on Motion for Class Certification	October 11, 2012	December 13, 2012 ¹
Fact Discovery Cutoff	November 30, 2012	January 29, 2013
Opening Expert Reports	December 14, 2012	February 12, 2013
Opposition Expert Reports	January 4, 2013	March 5, 2013
Expert Discovery Cutoff	January 25, 2013	March 26, 2013
Dispositive Motions and Daubert Motions	February 7, 2013	April 11, 2013
Oppositions to Dispositive and Daubert Motions		May 10, 2013
Replies to Dispositive and Daubert Motions		May 31, 2013

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28 ¹ Plaintiffs' counsel are available on December 20, 2012, but Defendants' counsel are not.
Plaintiffs' and Defendants' counsel are available on December 13, 2012.

EVENT	CURRENT	PROPOSED
Hearing on Dispositive Motions and Daubert Motions	March 14, 2013	June 20, 2013
Pretrial Conference	May 15, 2013	July 31, 2013 or August 21, 2013 ²
Jury Trial Begins	June 10, 2013	August 27, 2013 or November 11, 2013 ³

IT IS HEREBY STIPULATED:

Dated: July 9, 2012

LIEFF CABRASER HEIMANN & BERNSTEIN, LLP

By: /s/ Kelly M. Dermody
Kelly M. Dermody

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² The parties have agreed to the revised schedule with the exception of the trial date (*see n.3*). The pre-trial conference dates reflect these separate proposed trial dates.

³ Plaintiffs request a November 11, 2013 trial date in order to accommodate a pre-existing conflict that several of Plaintiffs' Counsel have with another trial set to commence on September 9, 2013 and run through early October 2013 in *In re Titanium Dioxide Antitrust Litigation*, No. 10-CV-00318 (RDB) (D. Md.). Present Interim Co-Lead Counsel Lieff Cabraser Heimann & Bernstein, LLP and Joseph Saveri of the Joseph Saveri Law firm are also Interim Co-Lead Counsel in *Titanium Dioxide*, and Mr. Saveri will serve as co-lead trial counsel in *Titanium Dioxide*. The Berger & Montague firm, Plaintiffs' co-counsel here, are also Court-appointed Executive Committee members in the *Titanium Dioxide* case and will be serving on the trial team. The Grant & Eisenhofer, P.A. firm, also serves as Plaintiffs' co-counsel here and on the Executive Committee in *Titanium Dioxide*.

Defendants propose a trial date in August 2013 in light of the Court's order granting a two-month extension and requesting a revised schedule which extends all deadlines correspondingly (Dkt. No. 165).

1
2 Dated: July 9, 2012

JOSEPH SAVERI LAW FIRM

3 By: /s/ Joseph R. Saveri
4 Joseph R. Saveri

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10
11 *Interim Co-Lead Counsel for Plaintiffs and the Proposed
12 Class*

13 Dated: July 9, 2012

O'MELVENY & MYERS LLP

14 By: /s/ Michael F. Tubach
15 Michael F. Tubach

16 Attorneys for Defendant Apple Inc.

17 Dated: July 9, 2012

KEKER & VAN NEST LLP

18 By: /s/ Daniel Purcell
19 Daniel Purcell

20 Attorneys for Defendant Lucasfilm Ltd.

21 Dated: July 9, 2012

JONES DAY

22 By: /s/ David C. Kiernan
23 David C. Kiernan

24 Attorneys for Defendant Adobe Systems Inc.

25 Dated: July 9, 2012

MAYER BROWN LLP

26 By: /s/ Lee H. Rubin
27 Lee H. Rubin

28 Attorneys for Defendant Google Inc.

Dated: July 9, 2012

BINGHAM McCUTCHEN LLP

By: /s/ Frank Hinman
Frank Hinman

Attorneys for Defendant Intel Corp.

1
2 Dated: July 9, 2012

JONES DAY

3 By: /s/ Robert A. Mittelstaedt
4 Robert A. Mittelstaedt

5 Attorneys for Defendant Intuit Inc.

6
7 Dated: July 9, 2012

COVINGTON & BURLING LLP

8 By: /s/ Emily Johnson Henn
9 Emily Johnson Henn

10 Attorneys for Defendant Pixar

11
12 **Filer's Attestation**

13 Pursuant to General Order No. 45, § X(B), I attest under penalty of perjury that concurrence in
14 the filing of the document has been obtained from all the signatories.

15
16 Dated: July 9, 2012

/s/ Dean M. Harvey
17 Dean M. Harvey

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2 PURSUANT TO STIPULATION, IT IS SO ORDERED.

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4 Dated: July 10, 2012

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7 Lucy H. Koh
8 United States District Judge

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